MAJOR SOURCE OPERATING PERMIT

Permittee: **Nichols Aluminum Alabama, Inc.**

Facility Name: **Nichols Aluminum Alabama, Inc.**

Facility No.: 712-0005

Location: Decatur, Alabama

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Ala. Code §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, Ala. Code §§22-22A-1 to 22-22A-15 (2006 Rplc. Vol. and 2007 Cum. Supp.), and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

Issuance Date: *Draft*

Expiration Date: *Draft*

Alabama Department of Environmental Management

TABLE OF CONTENTS

General Permit Provisos

Federally Enforceable Provisos	Regulations
1. Transfer	
This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in ADEM Admin. Code R. 335-3-16-.13(1)(a)5.	ADEM Admin. Code R. 335-3-16-.02(6)
2. Renewals	
An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.	ADEM Admin. Code R. 335-3-16-.12(2)
The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.	
3. Severability Clause	
The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivision, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.	ADEM Admin. Code R. 335-3-16-.05(e)
4. Compliance	
(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	ADEM Admin. Code R. 335-3-16-.05(f)
(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.	ADEM Admin. Code R. 335-3-16-.05(g)

General Permit Provisos

Federally Enforceable Provisos	Regulations
5. Termination for Cause This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.	ADEM Admin. Code R. 335-3-16-.05(h)
6. Property Rights The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.	ADEM Admin. Code R. 335-3-16-.05(i)
7. Submission of Information The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.	ADEM Admin. Code R. 335-3-16-.05(j)
8. Economic Incentives, Marketable Permits, and Emissions Trading No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.	ADEM Admin. Code R. 335-3-16-.05(k)
9. Certification of Truth, Accuracy, and Completeness: Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.	ADEM Admin. Code R. 335-3-16-.07(a)
10. Inspection and Entry Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following: (a) Enter upon the permittee's premises where a source	ADEM Admin. Code R. 335-3-16-.07(b)

Federally Enforceable Provisos	Regulations
is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit; (b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit; (c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit; (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.	
11. <u>Compliance Provisions</u>	
(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.	ADEM Admin. Code R. 335-3-16-.07(c)
(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.	
12. <u>Compliance Certification</u>	
A compliance certification shall be submitted on or before **March 4th** of each calendar year and shall cover the period between January 4th of the previous year and January 3rd of the current year.	ADEM Admin. Code R. 335-3-16-.07(e)
(a) The compliance certification shall include the following: (1) The identification of each term or condition of this permit that is the basis of the certification; (2) The compliance status; (3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with ADEM Admin. Code R. 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements); (4) Whether compliance has been continuous or intermittent; (5) Such other facts as the Department may require to determine the compliance status of the source;	

Federally Enforceable Provisos	Regulations
(b) The compliance certification shall be submitted to: Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463 and to: Air and EPCRA Enforcement Branch EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303	
13. <u>Reopening for Cause</u>	
Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit: (a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire. (b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit. (c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.	ADEM Admin. Code R. 335-3-16-.13(5)
14. <u>Additional ADEM Admin. Code R.s and Regulations</u>	
This permit is issued on the basis of ADEM Admin. Code R.s and Regulations existing on the date of issuance. In the event additional ADEM Admin. Code R.s and Regulations are adopted, it shall be the permit holder's responsibility to comply with such ADEM Admin. Code R.s.	§22-28-16(d), Code of Alabama 1975, as amended

General Permit Provisos

Federally Enforceable Provisos	Regulations
15. <u>Equipment Maintenance or Breakdown</u>	
(a) In the case of shutdown of air pollution control equipment (which operates pursuant to any permit issued by the Director) for necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Director at least twenty-four (24) hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. Such prior notice shall include, but is not limited to the following:	ADEM Admin. Code R. 335-3-1-.07(1), (2)
(1) Identification of the specific facility to be taken out of service as well as its location and permit number;	
(2) The expected length of time that the air pollution control equipment will be out of service;	
(3) The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;	
(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;	
(5) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.	
(b) In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director shall be notified when the breakdown has been corrected.	
16. <u>Operation of Capture and Control Devices</u>	
All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.	§22-28-16(d), Code of Alabama 1975, as amended

General Permit Provisos

Federally Enforceable Provisos	Regulations
17. <u>Obnoxious Odors</u>	
This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.	ADEM Admin. Code R. 335-3-1-.08
18. <u>Fugitive Dust</u>	
(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.	ADEM Admin. Code R. 335-3-4-.02
(b) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:	
(1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;	
(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;	
(3) By paving;	
(4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;	
Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.	
19. <u>Additions and Revisions</u>	
Any modifications to this source shall comply with the modification procedures in ADEM Admin. Code R.s 335-3-16-.13 or 335-3-16-.14.	ADEM Admin. Code R. 335-3-16-.13 and .14

General Permit Provisos

Federally Enforceable Provisos	Regulations
20. Recordkeeping Requirements	
(a) Records of required monitoring information of the source shall include the following: (1) The date, place, and time of all sampling or measurements; (2) The date analyses were performed; (3) The company or entity that performed the analyses; (4) The analytical techniques or methods used; (5) The results of all analyses; and (6) The operating conditions that existed at the time of sampling or measurement.	ADEM Admin. Code R. 335-3-16-.05(c)2.
(b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.	
21. Reporting Requirements	
(a) Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with ADEM Admin. Code R. 335-3-16-.04(9).	ADEM Admin. Code R. 335-3-16-.05(c)3.
(b) Deviations from permit requirements shall be reported within 48 hours or 2 working day of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.	

General Permit Provisos

Federally Enforceable Provisos	Regulations
22. <u>Emission Testing Requirements</u>	
Each point of emission which requires testing will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.	ADEM Admin. Code R. 335-3-1-.05(3) and ADEM Admin. Code R. 335-3-1-.04(1)
The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control ADEM Admin. Code R.s and regulations.	
To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:	
(1) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.	ADEM Admin. Code R. 335-3-1-.04
(2) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning).	
(3) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.	
(4) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.	
A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.	ADEM Admin. Code R. 335-3-1-.04
All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.	

General Permit Provisos

Federally Enforceable Provisos	Regulations
23. Payment of Emission Fees	
Annual emission fees shall be remitted each year according to the fee schedule in ADEM Admin. Code R. 335-1-7-.04.	ADEM Admin. Code R. 335-1-7-.04
24. Other Reporting and Testing Requirements	
Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control ADEM Admin. Code R.s and regulations. The Department may require emission testing at any time.	ADEM Admin. Code R. 335-3-1-.04(1)
25. Title VI Requirements (Refrigerants)	
Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F. No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F. The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.	40 CFR 82
26. Chemical Accidental Prevention Provisions	
If a chemical listed in Table 1 of 40 CFR Part 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then: (a) The owner or operator shall comply with the provisions in 40 CFR Part 68. (b) The owner or operator shall submit one of the following: (1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or, (2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	40 CFR Part 68

General Permit Provisos

Federally Enforceable Provisos	Regulations
27. Display of Permit	
This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and will be made readily available for inspection by any or all persons who may request to see it.	ADEM Admin. Code R. 335-3-14-.01(1)(d)
28. Circumvention	
No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 ADEM Admin. Code R.s and regulations.	ADEM Admin. Code R. 335-3-1-.10
29. Visible Emissions	
Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.	ADEM Admin. Code R. 335-3-4-.01(1)
30. Fuel-Burning Equipment	
(a) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.03.	ADEM Admin. Code R. 335-3-4-.03
(b) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-5-.01.	ADEM Admin. Code R. 335-3-5-.01
31. Process Industries – General	
Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.04.	ADEM Admin. Code R. 335-3-4-.04
32. Averaging Time for Emission Limits	
Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.	ADEM Admin. Code R. 335-3-1-.05

Federally Enforceable Provisos	Regulations
33. <u>Compliance Assurance Monitoring (CAM)</u>	40 CFR 64
Conditions (a) through (d) that follow are general conditions applicable to emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the unit specific provisos and the attached CAM appendices.	
(a) Operation of Approved Monitoring	40 CFR 64.7
(1) *Commencement of operation*. The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specified in the permit pursuant to §64.6(d).	
(2) *Proper maintenance*. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.	
(3) *Continued operation*. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.	
(4) *Response to excursions or exceedances*. (a) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control	

Federally Enforceable Provisos	Regulations
practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (b) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.	
(5) *Documentation of need for improved monitoring*. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.	
(b) Quality Improvement Plan (QIP) Requirements	40 CFR 64.8
(1) Based on the results of a determination made under Section 33(a)(4)(b) above, the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with 40 CFR §64.6(c)(3), the permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a	

Federally Enforceable Provisos	Regulations
higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices. (2) Elements of a QIP: (a) The owner or operator shall maintain a written QIP, if required, and have it available for inspection. (b) The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate: i. Improved preventive maintenance practices. ii. Process operation changes. iii. Appropriate improvements to control methods. iv. Other steps appropriate to correct control performance. v. More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (2)(b)(i) through (iv) above). (3) If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined. (4) Following implementation of a QIP, upon any subsequent determination pursuant to Section 33(a)(4)(b) above, the Department may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have: (a) Failed to address the cause of the control device performance problems; or (b) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for	

Federally Enforceable Provisos	Regulations
minimizing emissions.	
(5) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.	
(c) Reporting and Recordkeeping Requirements	40 CFR 64.9
(1) *General reporting requirements*	
(a) On and after the date specified in Section 33(a)(1) above by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with ADEM Admin. Code R. 335-3-16-.05(c)3.	
(b) A report for monitoring under this part shall include, at a minimum, the information required under ADEM Admin. Code R. 335-3-16-.05(c)3. and the following information, as applicable:	
i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;	
ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and	
iii. A description of the actions taken to implement a QIP during the reporting period as specified in Section 33(b) above. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.	
(2) General recordkeeping requirements.	
(a) The owner or operator shall comply with the recordkeeping requirements specified in ADEM	

Federally Enforceable Provisos	Regulations
Admin. Code R. 335-3-16-.05(c)2.. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section 33(b) above and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). (b) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	
(d) Savings Provisions	40 CFR 64.10
(1) Nothing in this part shall:	
a. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.	
b. Restrict or abrogate the authority of the Department to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.	
c. Restrict or abrogate the authority of the Department	

General Permit Provisos

Federally Enforceable Provisos	Regulations
to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.	

Summary Page for Cold Coil Rolling Mill w/ Mist Eliminator

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
E1	Cold Rolling Mill w/ Mist Eliminator	PM	Lesser of $E = 3.59 (P)^{0.62}$ or 22.7 lb/hr	ADEM Admin Code R. 335.3.4-.04 or 40 CFR Part 64
E1	Cold Rolling Mill w/ Mist Eliminator	VOC	N/A	
E1	Cold Rolling Mill w/ Mist Eliminator	Opacity	(see general provisos)	SIP

Provisos for Cold Coil Rolling Mill w/ Mist Eliminator

Federally Enforceable Provisos	Regulations
Applicability	
1. These units are subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "*Major Source Operating Permits*".	ADEM Admin. Code R. 335-3-16-.03
2. This source is subject only to Adem Admin Code r. 335-3-4-.04(1) "Control of Particulate Process Industries – General".	ADEM Admin. Code r. 335-3-4-.04(1)
3. This source is subject to ADEM Admin. Code R. 335-3-4-.01(1), "Control of Particulate Emissions – Visible Emissions".	ADEM Admin. Code R. 335-3-4-.01(1)
4. This source is subject to the applicable requirements of 40 CFR Part 64 "Compliance Assurance Monitoring". Pre-control potential particulate matter emissions exceed 100 TPY.	40 CFR Part 64
Emission Standards	
1. Particulate matter emissions from this unit shall not exceed the lesser of that which is calculated using the process weight equation as defined in ADEM Admin. Code R. 335-3-4-.04(1), or the requested PM limit of 22.7 lb/hr.	ADEM Admin. Code R. 335-3-4-.01(1) or 40 CFR Part § 64.3(b)(4)(ii)
Compliance and Performance Test Methods and Procedures	
1. Method 5D of 40 CFR (Latest Edition) Part 60, Appendix A, or an equivalent method as approved by the Department shall be used in the determination of particulate emissions from the stack.	ADEM Admin. Code R. 335-3-1-.04
2. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity of the stack emissions.	ADEM Admin Code R. 335-3-1-.04
3. If testing is required, VOC emissions shall be determined in accordance with Method 25a of 40 CFR 60 Appendix A.	ADEM Admin Code R. 335-3-1-.04
Emission Monitoring	
1. The Permittee shall perform the following inspections of the demister to verify proper operation. The following activities shall be performed: (a) Once per day perform a visual check of the demister. (b) If visible emissions in excess of 15% opacity are noted then Method 9 must be performed withing 24 hours of the observations. (c) Once per week a visual check the cold mill hoods for fugitive emissions. (d) Once per day record the pressure drop across the	ADEM Admin. Code R. 335-3-16-.05(c)(1)

Federally Enforceable Provisos	Regulations
demister. (e) If the pressure drop is outside the pressure differential range and is not correctable within a period of 1 hour then an inspection of the demister will be conducted and item (a) thru (d) will be perfomed.	
2. The facility shall perform a quarterly inspection of the demister to verify operation. The following activities shall be performed: (a) Once quarterly check fan and demister pads for proper operaton. (b) Once quarterly clean demister pads and system to insure proper operation. (c) Once quarterly perfor a visual check of all hoods and ductwork. (d) Record any repairs or observed problems. (e) If between quarterly inspections; a visible sheen of oil appears on the alley pavement or visible emission exceed 15%, an inspection of the demister will be conducted and items (a) thru (d) will be performed.	ADEM Admin. Code R. 335-3-16-.05(c)(1)
3. Particulate Matter emission monitoring requirements under 40 CFR Part 64, “Compliance Assurance Monitoring” can be found in Appendix A.	40 CFR Part 64 – CAM
Recordkeeping and Reporting Requirements	
1. The Permittee shall maintain a record of all inspections performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.	ADEM Admin Code R. 335-3-16-.05(c)(2)
2. The facility shall report any Method 9’s with an average opacity over 20%. Such reports shall be made within 48 hours of such observations.	ADEM Admin Code R. 335-3-16-.05(2)
3. This source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring" to include the Reporting and Recordkeeping Requirements in §64.9.	40 CFR Part 64 – CAM
4. The Permittee shall record the demister pressure drop daily. Any deviations from the pressure range shall be documented along with the corrective action and reported to the Department within two (2) working days. Each record shall be maintained for a period of 5 years.	40 CFR Part 64 – CAM

Summary Page for Annealing Oven #1 and #2

Permitted Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
E2	9.2 MMbtu/hr Annealing Oven	SO_2	N/A	N/A
E2	9.2 MMbtu/hr Annealing Oven	NO_X	N/A	N/A
E2	9.2 MMbtu/hr Annealing Oven	CO	N/A	N/A
E2	9.2 MMbtu/hr Annealing Oven	PM	N/A	N/A
E2	9.2 MMbtu/hr Annealing Oven	VOC	N/A	N/A
F1	9.2 MMbtu/hr Annealing Oven	CO-Fugitive	N/A	N/A
E3	9.2 MMbtu/hr Annealing Oven	SO_2	N/A	N/A
E3	9.2 MMbtu/hr Annealing Oven	NO_X	N/A	N/A
E3	9.2 MMbtu/hr Annealing Oven	CO	N/A	N/A
E3	9.2 MMbtu/hr Annealing Oven	PM	N/A	N/A
E3	9.2 MMbtu/hr Annealing Oven	VOC	N/A	N/A
F2	9.2 MMbtu/hr Annealing Oven	CO-Fugitive	N/A	N/A

Provisos for Annealing Oven #1 and #2

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-16-.03
Emission Standards	
1. This Source is subject to no additional specific requirements other those listed in the General Permit Provisos.	N/A
Compliance and Performance Test Methods and Procedures	
1. This Source is subject to no additional specific requirements other those listed in the General Permit Provisos.	N/A
Emission Monitoring	
1. This Source is subject to no additional specific requirements other those listed in the General Permit Provisos.	N/A
Recordkeeping and Reporting Requirements	
1. This Source is subject to no additional specific requirements other those listed in the General Permit Provisos.	N/A

Summary Page for Annealing Oven #3

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
E4	9.0 MMbtu/hr Annealing Oven	SO_2	N/A	N/A
E4	9.0 MMbtu/hr Annealing Oven	NO_X	N/A	N/A
E4	9.0 MMbtu/hr Annealing Oven	CO	N/A	N/A
E4	9.0 MMbtu/hr Annealing Oven	PM	N/A	N/A
E4	9.0 MMbtu/hr Annealing Oven	VOC	N/A	N/A

Provisos for Annealing Oven #3

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-16-.03
Emission Standards	
1. This Source is subject to no additional specific requirements other those listed in the General Permit Provisos.	N/A
Compliance and Performance Test Methods and Procedures	
1. This Source is subject to no additional specific requirements other those listed in the General Permit Provisos.	N/A
Emission Monitoring	
1. This Source is subject to no additional specific requirements other those listed in the General Permit Provisos.	N/A
Recordkeeping and Reporting Requirements	
1. This Source is subject to no additional specific requirements other those listed in the General Permit Provisos.	N/A

Summary Page for Aluminium Coil Coating Operation (250 FPM) with Regenerative Thermal Oxidizer

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
E5	Aluminum Coil Coating Line (250 FPM) with Regenerative Thermal Oxidizer	PM	*	SIP
E5	Secondary Crushing and Screening with Baghouse	VOC	39.9 TPY	Anti-PSD 335-3-14-.04
E5	Aluminum Coil Coating Line (250 FPM) with Regenerative Thermal Oxidizer	HAPs	9.0 TPY of individual HAP and 24.0 TPY of total HAPs	Anti- MACT 40 CFR 63.5090(a) Subpart SSSS
E5	Aluminum Coil Coating Line (250 FPM) with Regenerative Thermal Oxidizer	NO_X	N/A	N/A
E5	Aluminum Coil Coating Line (250 FPM) with Regenerative Thermal Oxidizer	CO	N/A	N/A
E5	Aluminum Coil Coating Line (250 FPM) with Regenerative Thermal Oxidizer	Opacity	(see general provisos)	SIP

* $E = 3.59\ (P)^{0.62}$ (P less than 30 tons per hour)
$E = 17.31\ (P)^{0.16}$ (P greater than 30 tons per hour)
Where E = Emissions in pounds per hour
P = Process weight per hour in tons per hour

Provisos Aluminum Coil Coating Operation (250 FPM) with Regenerative Thermal Oxidizer

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "*Major Source Operating Permits*".	ADEM Admin. Code R. 335-3-16-.03
2. This source is subject only to Adem Admin Code r. 335-3-4-.04(1) "Control of Particulate Process Industries – General".	ADEM Admin. Code r. 335-3-4-.04(1)
3. This source is subject to ADEM Admin. Code R. 335-3-4-.01(1), "Control of Particulate Emissions – Visible Emissions"	ADEM Admin. Code R. 335-3-4-.01(1)
4. The unit has an enforceable limit in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	ADEM Admin. Code R. 335-3-14-.04
5. This source is subject to the applicable requirements of 40 CFR Part 64 "Compliance Assurance Monitoring". Pre-control potential volatile organic compound emissions exceed 100 TPY.	40 CFR Part 64
Emission Standards	
1. VOC emissions from this unit shall not exceed the Anti-PSD limit of 39.9 tons in any consecutive 12-month period.	ADEM Admin. Code R. 335-3-4-.04
2. Emissions from this facility shall not exceed 9.0 tons of any individual HAP and 24.0 tons of any combination of HAPs in any consecutive 12-month rolling period.	40 CFR §63.5090 (a) MACT Avoidance
Compliance and Performance Test Methods and Procedures	
1. Method 5 of 40 CFR (Latest Edition) Part 60, Appendix A, or an equivalent method as approved by the Department shall be used in the determination of particulate emissions from the stack.	ADEM Admin. Code R. 335-3-1-.04
2. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity of the stack emissions.	ADEM Admin. Code R. 335-3-1-.05
3. If testing is required, VOC emissions shall be determined in accordance with Method 25a of 40 CFR 60 Appendix A.	ADEM Admin Code R. 335-3-1-.04
Emission Monitoring	
1. The thermal oxidizer must have an audible alarm or easily detectable signal which will provide a warning when the combustion chamber 3-hour average temperature decreases to less than the established minimum operational temperature. The origin and detectability of the audible or other signal shall be such that it can be readily heard or detected by the operator or another person who will immediately determine the cause and take appropriate action to correct any problem and/or	ADEM Admin Code R. 335-3-16-.05

Federally Enforceable Provisos	Regulations
record the malfunction/reason.	
2. Volatile organic compounds emission monitoring requirements under 40 CFR Part 64, "Compliance Assurance Monitoring" can be found in Appendix A.	40 CFR Part 64 – CAM
Recordkeeping and Reporting Requirements	
1. Records of the rolling 12-month total VOC emissions shall be kept in a form suitable for inspection and maintained for a period of 5 years. These records shall contain the following information: (a) The type, quantity in gallons, and weight in pounds, of each VOC containing materials used each calendar month. (b) The VOC content by weight (in pounds per gallon) of each VOC containing materials used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A, or equivalent vendor data. (c) The percent by weight of VOCs of each material used each calendar month. (d) The amount of VOCs emitted each calendar month expressed in the unit of pounds and tons. (e) The rolling 12-month total of VOCs emitted in the units of pounds and tons.	ADEM Admin. Code R. Rule 335-3-16-.05
2. The time, duration, cause(s), and the action(s) taken for any thermal oxidizer temperature less than the established minimum shall be recorded in a form suitable for inspection. These records shall be maintained for at least two years. For periods when the 3-hour average temperature is below the minimum operating temperature, VOCs and HAPs will be calculated as if there was no (0%) capture and destruction of VOCs and HAPs in the thermal oxidizer.	
3. Records will be maintained of any malfunction of the thermal oxidizer, which results in an increase in the VOC and HAP emissions from any or all process equipment. These records will be maintained in a form suitable for inspection for a period of two years.	
4. This source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring" to include the Reporting and Recordkeeping Requirements in §64.9.	40 CFR Part 64 - CAM
5. The facility shall maintain a record of the 3-hour average combustion chamber temperature to satisfy the requirements of monitoring. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	40 CFR PART 64 - CAM

Federally Enforceable Provisos	Regulations
6. The facility shall maintain a record of the 3-hour average of duct static pressure and damper positioning to satisfy the requirements of monitoring. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	40 CFR PART 64 - CAM
7. The facility shall maintain a record of all calibrations of the thermocouples. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	40 CFR PART 64 - CAM
8. The facility shall maintain a record of all calibrations of the pressure transducer. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	40 CFR PART 64 - CAM

APPENDIX A

40 CFR 64

Compliance Assurance Monitoring (CAM)

MONITORING APPROACH: Cold Mill (Rolling) Operation

	Indicator 1	Indicator 2
I. Indicator	Cold Mill Hoods	Mist Elimination System
Measurement Approach	Visible Emissions	Visible emissions in excess of 15 %
II. Indicator Range	Excursions are defined as any instance where the opacity exceeds 15%.	The facility shall report any Method 9's with an average opacity over 15%.
QIP Threshold	Record daily pressure drop across the mist eliminator	Pressure drop outside normal pressure drop range of 2 in w.c to 8 in w.c and not corrected within one-hour. An excursion triggers an investigation into the cause and the appropriate corrective action will be performed and documented.
III. Performance Criteria		
Data Representativeness	Pressure drop across the mist eliminator.	Duct static pressure monitored in the duct upstream of the mist eliminator.
Verification of Operation Status	The monitoring equipment will be inspected for visible emissions daily and recorded whether operation or not	The monitoring equipment will be inspected for visible emissions daily and recorded whether operation or not
QA/QC Practices and Criteria	The pressure drop is inspected and recorded daily	The pressure drop is inspected and filter cleaned quarterly
Monitoring Frequency	Daily inspection of the hoods and pressure drop	Quarterly clean mist eliminator filters, check fan, visual check of hoods and ductwork.
Data Collection Procedures	The observation will be documented by the observer	The observation will be documented by the observer
Averaging Period	Daily, quarterly	Daily, quarterly

MONITORING APPROACH: Aluminum Coil Coating Operation with Regenerative Thermal Oxidizer

	Indicator 1	Indicator 2
I. Indicator	Combustion Chamber Temperature	Duct Static Pressure
Measurement Approach	Thermocouple located in the combustion chamber of the RTO.	Pressure transducer located in cumulative capture system duct.
II. Indicator Range	Excursions are defined as any instance where the 3-hour average of combustion chamber temperature falls below 1500°F. If an excursion occurs, the coater heads will be pulled and the coater heads will not re-engage until corrective action and reporting are performed.	An excursion is defined as any instance where the 3-hour average duct static pressure measured before the booster blower fan falls below negative 4 in. H_2O or when the fixed position of the dampers on hoods A, B, C, or D is less 50% open. Excursions trigger an inspection, corrective action, and reporting requirements.
III. Performance Criteria		
Data Representativeness	Temperature measured by a thermocouple located inside the combustion chamber of the RTO.	Duct static pressure monitored by a pressure transducer located in the duct upstream of the booster blower control damper.
Verification of Operation Status	The monitoring equipment will be operated and maintained per the manufacture's requirements or recommendations for installation, calibration, and start-up operation.	The monitoring equipment will be operated and maintained per the manufacture's requirements or recommendations for installation, calibration, and start-up operation.
QA/QC Practices and Criteria	The thermocouple will be inspected and calibrated quarterly.	The pressure transducer will be inspected and calibrated annually.
Monitoring Frequency	Temperature is continuously monitored.	Pressure is continuously monitored.
Data Collection Procedures	Monitoring data is collected stored within the IHistorian program.	Monitoring data is collected stored within the IHistorian program.

Averaging Period	The 3-hour average will be based on 3-hours of coating line run time (production down-time will be excluded from the average).	The 3-hour average will be based on 3-hours of coating line run time (production down-time will be excluded from the average).